

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

UNITED STATES OF AMERICA,
Plaintiff

VERSUS

CATAHOULA PARISH SCHOOL
BOARD, *et al.*,
Defendants

* CIVIL ACTION NO. 69-14430 (LEAD)
* CIVIL ACTION NO. 19-01094 (MEMBER)
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* JUDGE ROBERT G. JAMES
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**MOTION TO SEAL EXHIBIT B TO RESPONSE OF
CATAHOULA PARISH SCHOOL BOARD TO SMITH LETTER**

COMES NOW, the Catahoula Parish School Board (the “Board”), who respectfully moves for an order from this Court to file Exhibit B to the Board’s response to Ms. Jill Lossin Smith’s letter under seal and, in support thereof, would show as follows:

Exhibit B contains E.S.’s individualized healthcare plan that contains sensitive medical information. In order to protect E.S.’s privacy, the Board respectfully requests that Exhibit B be filed under seal. This Motion is supported by the contemporaneously filed Memorandum.

WHEREFORE, PREMISES CONSIDERED, the Catahoula Parish School Board moves for the entry of the proposed Order submitted contemporaneously herewith to allow Exhibit B to the Board’s Response to be filed under seal.

Respectfully submitted, this the 9th day of October 2019.

CATAHOULA PARISH SCHOOL BOARD

HAMMONDS, SILLS, ADKINS & GUICE, LLP
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s/ John Richard Blanchard

ROBERT L. HAMMONDS

Bar Roll No. 6484

PAMELA WESCOVICH DILL

Bar Roll No. 31703

JOHN RICHARD BLANCHARD

Bar Roll No. 37036

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing MOTION was filed electronically with the Clerk of Court by use of the CM/ECF system, which will send a notice of electronic filing to counsel registered with the Court for receipt of pleadings by e-mail.

I do hereby further certify that, on the date stated below, a true and correct copy of the above foregoing MOTION and accompanying Exhibits, in print format, was forwarded via U.S. mail to Ms. Jill Lossin Smith at the following address which was listed on her letter to the Court:

Jill Lossin Smith
21835 Hwy 124
Jonesville, Louisiana 71343

BATON ROUGE, LOUISIANA, this the 9th day of October 2019.

s/ John Richard Blanchard

JOHN RICHARD BLANCHARD

Bar Roll No. 37036